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Attorneys for Plaintiff
Kelly Wilson

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

KELLY WILSON, an individual,

Plaintiff,

vs.

THE WALT DISNEY COMPANY, a Delaware corporation; DISNEY ENTERPRISES, INC., a Delaware corporation; WALT DISNEY PICTURES, a California corporation; WALT DISNEY MOTION PICTURES GROUP, INC., a California corporation; and DOES 1 through 25, inclusive,

Defendants.

Case No. 3:14-cv-01441-VC

**DECLARATION OF J. A. TED BAER
IN SUPPORT OF PLAINTIFF'S
OPPOSITION TO DEFENDANTS'
MOTION FOR SUMMARY
JUDGMENT**

Judge: Hon. Vince G. Chhabria

Date: April 9, 2015

Time: 10:00 a.m.

Ctrm: 4

DECLARATION OF J.A. TED BAER

I, J. A. Ted Baer, hereby declare:

1. I am an attorney at law, duly licensed to practice before all courts of the State of California and the United States District Court for the Northern District of California. I am the president of the Law Office of J. A. Ted Baer, A Professional Corporation, counsel of record for Plaintiff in the above-entitled action. I am personally familiar with the matters stated herein, and if called upon to testify concerning such matters, I could and would testify accordingly.

2. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the transcript of the deposition of James McDonald. This deposition was designated "confidential" by Defendants.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the "Certificate of Secretary" Marsha L. Reed of The Walt Disney Company produced by defendants The Walt Disney Company, Disney Enterprises, Inc., Walt Disney Pictures, and Walt Disney Motion Pictures Group, Inc. ("Defendants") in this action.

4. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts from the transcript of the deposition of Elyse Klaidman. This deposition was designated "confidential" by Defendants.

5. Attached hereto as **Exhibit 4** is a true and correct copy of the document labeled TWDC_00000212 that was produced by Defendants in this action. This document was designated "confidential" by Defendants.

6. Attached hereto as **Exhibit 5** is a true and correct copy of the document labeled TWDC_00000161 that was produced by Defendants in this action. This document was designated "confidential" by Defendants.

7. Attached hereto as **Exhibit 6** is a true and correct copy of the document labeled TWDC_00000208 that was produced by Defendants in this action. This document was designated "confidential" by Defendants.

1 8. Attached hereto as **Exhibit 7** is a true and correct copy of the document labeled
2 WDP_0001454 that was produced by Defendants in this action and marked as Exhibit 155 at the
3 deposition of Elyse Klaidman. This document was designated “confidential” by Defendants.

4 9. Attached hereto as **Exhibit 8** is a true and correct copy of the document labeled
5 WDP_00002912 that was produced by Defendants in this action and marked as Exhibit 156 at
6 the deposition of Elyse Klaidman. This document was designated “confidential” by Defendants.

7 10. Attached hereto as **Exhibit 9** is a true and correct copy of excerpts from the
8 transcript of the deposition of Carlos Baena. This deposition was designated “confidential” by
9 Defendants.

10 11. Attached hereto as **Exhibit 10** is a true and correct copy of the document labeled
11 PIXAR_00001838-1852 that was produced by Defendants in this action. This document was
12 designated “confidential” by Defendants.

13 12. Attached hereto as **Exhibit 11** is a true and correct copy of excerpts from the
14 transcript of the deposition of Matt Roberts. This deposition was designated “confidential” by
15 Defendants.

16 13. Attached hereto as **Exhibit 12** is a true and correct copy of excerpts from the
17 transcript of the deposition of Edwin Fabian. This deposition was designated “confidential” by
18 Defendants.

19 14. Attached hereto as **Exhibit 13** is a true and correct copy of Defendants’ Responses
20 and Objections to Plaintiff’s First Set of Requests for Admission (Nos. 1-6).

21 15. Attached hereto as **Exhibit 14** is a true and correct copy of excerpts from the
22 transcript of the deposition of Maureen Furniss, Ph.D.

23 16. Attached hereto as **Exhibit 15** is a true and correct copy of the resume of James
24 McDonald produced at the deposition of James McDonald. This document was labeled as
25 Exhibit 203 at the deposition of James McDonald.
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1 17. Attached hereto as **Exhibit 16** is a true and correct copy of Expert Rebuttal Report of
2 Maureen Furniss, Ph.D. This report was produced to Defendants during discovery in this
3 action.

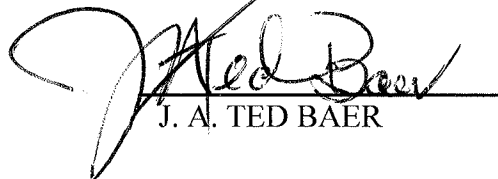
4 18. Attached hereto as **Exhibit 17** is a true and correct copy of excerpts from the
5 transcript of the deposition of Paul Briggs. This deposition was designated "confidential" by
6 Defendants.

7 19. Attached hereto as **Exhibit 18** is a true and correct copy of Defendants' Responses
8 and Objections to Plaintiff's Second Set of Interrogatories (Nos. 14-21).

9 20. Attached hereto as **Exhibit 19** is a true and correct copy of excerpts from the
10 transcript of the deposition of Peter Del Vecho. This deposition was designated "confidential"
11 by Defendants.
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13 I declare under penalty of perjury under the laws of the United States of America
14 that the foregoing is true and correct.

15 Executed this 19th day of March 2015, at Santa Barbara, California.

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18 J. A. TED BAER
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